

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

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MURAD Y. AMEEN

vs.

AMPHENOL PRINTED CIRCUITS, INC.

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DEPOSITION of VALERIE HARTLEN,
Deposition taken at Upton & Hatfield,
10 Centre Street, Concord, New Hampshire,
on Thursday, May 9, 2013, commencing
at 10:02 a.m.

Court Reporter:
Pamela Carle, LCR, RPR, CRR
New Hampshire LCR No. 98

1 Q. Sorry, did I say Ms. Harrington
2 already?

3 A. Ms. Simons?

4 Q. Ms. Simons did not suggest that that
5 was important to do?

6 A. No.

7 Q. So doing an audit of other employees to
8 see if anyone else was taking extra time on breaks
9 was not a priority for you?

10 A. I wouldn't say it wasn't a priority, I
11 just -- I had so much on my plate at that time I
12 didn't take the time to audit.

13 Q. And over the past seven months that's
14 never been something that you felt that you had
15 time to do?

16 A. I haven't -- I have not done any of the
17 audit plans.

18 Q. Do you have any plans to do any further
19 audits in the future?

20 A. I haven't got that on my list.

21 Q. You did mention a few minutes ago that
22 you did audit the employees in Mr. Ameen's
23 department back in October of 2012.

1 A. Yes, when I -- when we found the issue
2 with Donny.

3 Q. Did you retain the documents for all
4 the other employees who were audited?

5 A. I don't know if I did or not.

6 Q. Did you find any issues of employees
7 taking any more than 45 minutes total time off --

8 A. No.

9 Q. -- during their shift?

10 A. No.

11 Q. Did you check both the door accesses
12 and the timecards?

13 A. Yes. I believe I did, yes.

14 Q. And did someone do a spreadsheet of
15 some kind to see if they took exactly 45 minutes
16 or 46 minutes or 48 minutes?

17 A. Did I do a spreadsheet?

18 Q. Did anyone, to your knowledge, see if
19 any extra time was taken?

20 A. They wouldn't -- I'm the only one that
21 had the documents, so it would be me, and, no,
22 don't believe I did.

23 Q. And were you looking to see if there